

000013407

CORRES CONTROL  
INCOMING LTR NO

5006 RF 93

States Government

Department of Energy

DUE  
DATE

Rocky Flats Office

## Memorandum

NOV 24 2 14 PM '93

## ACTION

DIST LTR ENC

NOV 23 1993

EG&G  
ROCKY FLATS  
CORP

ERD SRG 13047

Approval of the National Environmental Policy Act Documentation for Operable Unit No 2

Patricia Powell, NEPA Compliance Officer, Environmental Protection Division, RFO

We have reviewed and approved the re-evaluation of the National Environmental Policy Act (NEPA) documentation from EG&G, dated October 19, 1993, (93-RF-12896) on Operable Unit (OU) No 2 (903 Pad, Mound, and East Trenches) We agree with the recommendation from EG&G's NEPA Compliance Committee that an Environmental Assessment (EA) is the appropriate level of NEPA for the OU-2 project.

In the October 26, 1993, memorandum (EPD PMP 12325) from your division, it was indicated that an EIS level of NEPA documentation is considered appropriate Reasoning for the EIS level was based on the likely soil remediation of 61 acres, as described in EG&G's Action Description Memorandum (ADM) We disagree that an EIS is required for the OU-2 proposed actions We believe that an EA should be prepared, rather than an EIS

The following is a discussion on the points from the October 26 memorandum

Potential for re-suspension of plutonium contaminated dust during excavation of soils on 61 acres. Appropriate actions would be taken to limit re-suspension of contaminants, including plutonium Evaluation of potential actions would weigh the alternative of non-action against potential risks of action Wetting of the soil, containment, vacuuming/HEPA filtration, and other actions would be considered before removal of soil would be undertaken Regardless, we do not consider the limited potential for re-suspension of contaminants in a soil remediation to warrant an EIS

Lack of demonstrated success in reclaiming disturbed land around RFP (such as at OU-3) which reduces the prospects of being able to successfully re-vegetate the disturbed 61 acres and therefore mitigate the impacts from remediation The "remedy" directed for OU-3 (Offsite Releases) was "discing," which is an agricultural technique rather than a remediation technique Discing brought rocks to the surface at OU-3 This with the non-native growth and prairie dogs set a situation not the best for re-vegetation efforts The soils types in the vicinity of OU-2 are different from OU-3 and more similar to the soil types in OU-1 (881 Hillside) The success of the re-vegetation effort on the French Drain excavation in OU-1 indicates that re-vegetation efforts for OU-2 would be successful

CORRES CONTROL x x  
PATS/T130G  
ADMINISTRATIVEReviewed for Addressee  
Corres Control RFP11-24-93  
DATE BY

Ref Ltr #

DOE ORDER # 5400 1  
5440 1ADMIN RECORD  
BZ -A-00083

NOV 23 1993

A Howard  
ERD SRG 13047

2

A reference in the ADM to the need to construct a waste storage facility which should be considered in the context of waste management for the plant as a whole. Waste storage and management is not just an issue for OU-2. Waste management facilities are being pursued on a sitewide basis, and we should not hold OU-2 hostage to an EIS when the issue is sitewide.

The necessity to identify the potential impacts in a public forum which includes RFP's Natural Resource Trustees so that if RFP is required to implement a remedy that has severe impacts to the natural environment, the Trustees will have been involved in the decision making process. An EA level of NEPA documentation does not preclude public and/or Trustee participation in the decision making process. To the contrary, the CERCLA process agreed to in our Environmental Restoration InterAgency Agreement provides for public and Trustee participation regardless of the DOE NEPA process. The main argument by the Environmental Protection Agency and the Colorado Department of Health against NEPA documentation for our IAG activities is that there is no value-added because the CERCLA documentation is equivalent to the NEPA requirements. Recommending an EIS for what is clearly, at-most, an EA level activity only further discredits our program with the regulatory agencies. The ERD has committed to include the Trustees early-on in Environmental Restoration activities.

If you have any questions, please contact Scott Grace of my staff at extension 7199



Richard J. Schassburger  
Acting Director  
Environmental Restoration Division

cc  
A Rampertaap, EM-453  
N Hutchins, EG&G  
S Nesta, EG&G  
B Moore, EG&G  
A Primrose, EG&G